

**Baker & Hostetler LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan

*Attorneys for Irving H. Picard,  
Trustee for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor,

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SONJA KOHN, et al.,

Defendants.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-05411 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, and defendants Sonja Kohn, Infovaleur, Inc. and Tecno Development & Research, Ltd. (the “Defendants”), by their undersigned counsel, that the time by which the Defendants may respond to the Motion for Leave to File a Third Amended Complaint filed by the Trustee is extended up to and including July 15, 2015. It is further stipulated and agreed that the Trustee shall file his reply by August 5, 2015. The return date for this matter is set for August 26, 2015 at 10:00 a.m.

The purpose of this stipulated extension (the “Stipulation”) is to provide additional time for the Defendants to respond to the Motion to Amend. The extension of time granted by this Stipulation is without prejudice to any future extensions of time.

Undersigned counsel for the Defendants represent that service of process of the summons and Complaint on the Defendants has been completed, and hereby waives any defenses based on insufficiency of process or insufficiency of service of process on behalf of the Defendants.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: April 27, 2015  
New York, New York

**BAKER & HOSTETLER LLP**

By: /s/ Keith R. Murphy  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Keith R. Murphy  
Email: kmurphy@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the estate  
of Bernard L. Madoff*

**NEUBERGER, QUINN, GIELEN, RUBIN, GIBBER,  
P.A.**

By: /s/ Nathan D. Adler  
One South Street, 27<sup>th</sup> Floor  
Baltimore, Maryland 21202  
Telephone: (410) 332-8584  
Facsimile: (410) 332-8561  
Price O. Gielen  
Email: [pog@nqgrg.com](mailto:pog@nqgrg.com)  
Nathan D. Adler  
Email: [nda@nqgrg.com](mailto:nda@nqgrg.com)

*Attorneys for Defendants Sonja Kohn,  
Infovaleur and Tecno Gibraltar*

SO ORDERED this 28<sup>th</sup> day of April, 2015.

/s/ Stuart M. Bernstein  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE